

# **ATTACHMENT**

## **D**

**DECLARATION OF RAYMOND NEIRINCKX**

I, Raymond Neirinckx, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am the Housing Commission Coordinator at the Office of Housing and Community Development for the State of Rhode Island's Department of Administration Division of Planning. I have held this position since January of 2000.

2. I work in two offices: The Department of Community Development and Technical Assistance and the Office of Home Ownership.

3. The Community Development Office works to develop viable communities by providing decent housing, expanding economic opportunities and creating suitable living environments, primarily for low/moderate income people.

4. The Home Ownership Office works to increase home ownership and provide direct foreclosure advocacy.

5. Since the mid-1980's, I have been working with Community Development Corporations ("CDC's") in Providence. As a result of this work, I am knowledgeable about the work that CDC's in Providence do and the banks that they partner with.

6. Because of my positions in the Community Development Office and the Office of Home Ownership, I regularly observe which banks are present in Rhode Island communities servicing low-income, minority borrowers.

7. Since the bulk of my cases are located in Providence, I am particularly aware of which banks are present in Providence communities servicing low-income, minority borrowers.

8. Banks that serve underserved communities extend credit to low-income homebuyers, participate in first-time homebuyer educational programs, help borrowers with credit repair, and refinance products at the market rate.

9. Coastway, Webster Bank, TD Bank, Bank of America, and Citizens Bank are some examples of banks that have been involved in helping underserved, minority communities in Providence.

10. Citizens Bank in particular takes seriously its obligation to service low-income, minority borrowers and minority neighborhoods in Providence.

11. Before it was bought by Santander, Sovereign Bank did some investment in Providence's underserved minority neighborhoods. That was back in 2006 and 2007. Since Santander purchased Sovereign in early 2009, Sovereign has significantly cut back its investment in these neighborhoods.

12. In my experience, Santander Bank (formerly known as Sovereign Bank) is absent from the communities I work in. They are not a lender I would turn to for help servicing the communities I work with.

13. Santander seems unwilling to both provide financing for low-income, minority borrowers and fully participate in first-time homebuyer programs or the Home Affordable Refinance Program (HARP). This has remained the case right up to the present time. Even after Santander's re-branding campaign in the fall of 2013, I have not noticed a change in their lack of commitment to minority neighborhoods in Providence and elsewhere in the State of Rhode Island.

14. Right after Royal Bank of Scotland ("RBS") acquired Citizens Bank, I met with officials from RBS and Citizens Bank to discuss domestic Community Reinvestment Act ("CRA") laws and how RBS could work to meet CRA obligations..

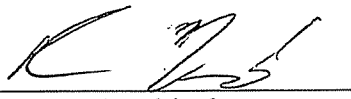
15. I am not aware and have not heard from any source that Santander expressed the same interest in domestic CRA laws when Santander acquired Sovereign Bank. Further, I am not aware and have not heard from any source that since acquiring Sovereign Bank, Santander has expressed interest in domestic CRA laws.

16. In the last 18 months, Citizens Bank has had an active presence in low/moderate income minority communities by purchasing housing credits as a direct investor, working to finance low-income housing projects, and collaborating with CDC's to take over defaulted properties and renovate them for the local community.

17. There has been no similar engagement that I am aware of from Santander in Providence's minority communities.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: March 5, 2014.

BY:   
Raymond Neirinckx